

In the Matter of the Implementation of the Federal Communications Commission's Triennial Review Order, New Jersey Board of Public Utilities Docket No. TO03090705, on behalf of the New Jersey Division of the Ratepayer Advocate, filed February 2, 2004.

*Testimony before State Legislatures:*

Testified on September 24, 1997, before the Massachusetts State Legislature Joint Committee on Government Regulations regarding House Bill 4937 (concerning area codes).

**Publications/Presentations**

Articles on telecommunications and energy policy in trade journals, and presentations at industry associations and conferences include the following:

*Reports:*

"Assessing SBC/Pacific's Progress in Eliminating Barriers to Entry: The Local Market in California Is Not Yet 'Fully and Irreversibly Open'" (with Patricia D. Kravtin, Dr. Lee L. Selwyn, and Douglas S. Williams). Prepared for the California Association of Competitive Telecommunications Companies, July 2000.

"Where Have All the Numbers Gone? (Second Edition): Rescuing the North American Numbering Plan from Mismanagement and Premature Exhaust" (with Dr. Lee L. Selwyn). Prepared for the Ad Hoc Telecommunications Users Committee, June 2000.

"Price Cap Plan for USWC: Establishing Appropriate Price and Service Quality Incentives for Utah" (with Patricia D. Kravtin and Scott C. Lundquist). Prepared for the Utah Division of Public Utilities, March 22, 2000.

"Telephone Numbering: Establishing a Policy for the District of Columbia to Promote Economic Development" (with Douglas S. Williams and Sarah C. Bosley). Prepared for the District of Columbia Office of People's Counsel, February 2000 (submitted to Eric W. Price, Deputy Mayor, April 6, 2000).

"The Use of Cost Proxy Models to Make Implicit Support Explicit, Assessing the BCPM and the Hatfield Model 3.1" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, March 1997.

"The Use of Forward-Looking Economic Cost Proxy Models" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC Docket No. CCB/CPB 97-2, February 1997.

"Continuing Evaluation of Cost Proxy Models for Sizing the Universal Service Fund, Analysis of the Similarities and Differences between the Hatfield Model and the BCM2" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, October 1996.

"Converging on a Cost Proxy Model for Primary Line Basic Residential Service, A Blueprint for Designing a Competitively Neutral Universal Service Fund" (with Dr. Lee L. Selwyn). Prepared for the

National Cable Television Association, submitted in FCC CC Docket No. 96-45, August 1996.

"The BCM Debate, A Further Discussion" (with Dr. Lee L. Selwyn and Helen E. Golding). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, May 1996.

"The Cost of Universal Service, A Critical Assessment of the Benchmark Cost Model" (with Dr. Lee L. Selwyn). Prepared for the National Cable Television Association, submitted in FCC CC Docket No. 96-45, April 1996.

"Funding Universal Service: Maximizing Penetration and Efficiency in a Competitive Local Service Environment" (with Dr. Lee L. Selwyn). Prepared for Time Warner Communications, Inc., October 1995.

"A Balanced Telecommunications Infrastructure Plan for New York State" (with Dr. Lee L. Selwyn). Prepared for the New York User Parties, December 4, 1992.

"A Roadmap to the Information Age: Defining a Rational Telecommunications Plan for Connecticut" (with Dr. Lee L. Selwyn, Susan M. Gately, JoAnn S. Hanson, David N. Townsend, and Scott C. Lundquist). Prepared for the Connecticut Office of Consumer Counsel, October 30, 1992.

"Analysis of Local Exchange Carrier April 1988 Bypass Data Submissions" (with William P. Montgomery and Dr. Lee L. Selwyn). Prepared for the National Association of State Utility Consumer Advocates, August 1988.

"Strategic Planning for Corporate Telecommunications in the Post-Divestiture Era: A Five Year View" (with Dr. Lee L. Selwyn, William P. Montgomery, and David N. Townsend). Report to the International Communications Association, December 1986.

"Competitive Pricing Analysis of Interstate Private Line Services." Prepared for the National Telecommunications Network, June 1986.

"Analysis of Diamond State Telephone Private Line Pricing Movements: 1980-1990." Prepared for Network Strategies, Inc., April 1985.

"Analysis of New York Telephone Private Line Pricing Movements: 1980-1990." Prepared for Network Strategies, Inc., February 1985.

*Presentations:*

"Impact of Federal Regulatory Developments on Consumers and Consumers' Impact on Regulatory Developments," Presentation for the Washington Attorney General's Office, Seattle, Washington, May 27, 2003.

"The Finances of Local Competition" Presentation at the New England Conference of Public Utilities Commissioners 54th Annual Symposium, Mystic, Connecticut, May 21, 2001.

"Facilities-Based Competition" Presentation at the New England Conference of Public Utilities Commissioners 52nd Annual Symposium, Bretton Woods, New Hampshire, May 24, 1999.

"Exploring Solutions for Number Exhaust on the State Level" and "A Forum for Clarification and Dialogue on Numbering Ideas," ICM Conference on Number Resource Optimization, December 10-11, 1998.

"Telecommunications Mergers: Impact on Consumers," AARP Legislative Council 1998 Roundtable Meeting, November 18, 1998

"Consumer Perspectives on Incumbent Local Exchange Carrier Mergers," National Association of Regulatory Utility Commissioners 110th Annual Convention, November 11, 1998.

Federal Communications Commission En Banc Hearing on "Proposals to Revised the Methodology for Determining Universal Service Support," CC Docket Nos. 96-45 and 97-160," June 8, 1998, panelist.

"Universal Service: Real World Applications," 1997 National Association of State Utility Consumer Advocates Mid-Year Meeting, June 9, 1997.

"Modeling operating and support expenses" and "Modeling capital expenses," panelist for Federal-State Joint Board on Universal Service Staff Workshops on Proxy Cost Models, January 14-15, 1997, CC Docket 96-45.

"Evaluating the BCM2: An Assessment of Its Strengths and Weaknesses," presentation to the AT&T Cost Team (with Michael J. DeWinter), December 4, 1996.

"Interpreting the Telecommunications Act of 1996 Mandate for the Deployment of Advanced Telecommunications Services in a Fiscally Responsible and Fully Informed Manner" (with Helen E. Golding), *Proceedings of the Tenth NARUC Biennial Regulatory Information Conference*, Volume 3, September 11-13, 1996.

"Making Adjustments to the BCM2." Presentation to the Staff of the Federal-State Joint Board on Universal Service, September 16, 1996.

"Converging on a Model: An Examination of Updated Benchmark Cost Models and their Use in Support of Universal Service Funding." Presentation to the National Association of Regulatory Utility Commissioners Summer Committee Meetings, July 22, 1996.

"The Phone Wars and How to Win Them" (with Helen E. Golding). *Planning*, July 1996 (Volume 62, Number 7).

"ETI's Corrections to and Sensitivity Analyses of the Benchmark Cost Model." Presentation to the Staff of the Federal-State Joint Board on Universal Service," May 30, 1996.

"Redefining Universal Service." Presentation at the *Telecommunications Reports* conference on "Redefining Universal Service for a Future Competitive Environment," January 18, 1996.

"Funding Universal Service: Maximizing Penetration and Efficiency in a Competitive Local Service Environment," (with Lee L. Selwyn, under the direction of Donald Shephard), a Time Warner Communications Policy White Paper, September 1995.

"Stranded Investment and the New Regulatory Bargain," (with Lee L. Selwyn, under the direction of Donald Shephard), a Time Warner Communications Policy White Paper, September 1995.

"New Frontiers in Regulation." Presentation to the New England Women Economists Association, December 12, 1995.

"Local Cable and Telco Markets." Presentation at the New England Conference of Public Utilities Commissioners 46th Annual Symposium, June 29, 1993.

"Relationship of Depreciation to State Infrastructure Modernization." Presentation at the *Telecommunications Reports* conference on "Telecommunications Depreciation," May 6, 1993.

"Crafting a Rational Path to the Information Age." Presentation at the State of New Hampshire's conference on the "Twenty-First Century Telecommunications Infrastructure," April 1993.

"The Political Economics of ISDN," presentation at the John F. Kennedy School of Government seminar on "Getting from Here to There: Building an Information Infrastructure in Massachusetts," March 1993.

"ISDN Rate-Setting in Massachusetts." *Business Communications Review*, June 1992 (Volume 22, No. 6).

"The New Competitive Landscape: Collocation in Massachusetts." Presentation at TeleStrategies Conference on Local Exchange Competition, November 1991.

"Telecommunications Policy Developments in Massachusetts." Presentations to the Boston Area Telecommunications Association, October 1989; March 1990; November 1990; June 1992. Presentation to the New England Telecommunications Association, March 1990.

"Tariff Data is Critical to Network Management." *Telecommunications Products and Technology*, May 1988 (Volume 6, No. 5).

"How to Capitalize on the New Tariffs." Presentation at Communications Managers Association conference, 1988.

"Auction Methods for the Strategic Petroleum Reserve" (With Steven Kelman and Richard Innes). Prepared for Harvard University Energy Security Program, July 1983.

"How Two New England Cities Got a \$100 Million Waste-to-Energy Project" (with Diane Schwartz). *Planning*, March 1983 (Volume 49, Number 3).

"Evaluation of Economic Development and Energy Program in Lawrence, Massachusetts." (with Richard Innes). Prepared for U.S. Department of Energy, August, 1982.

"Energy Efficiency in New England's Rental Housing." New England Regional Commission, 1981.

"Low Level Radioactive Waste Management in New England." New England Regional Commission, 1981.

“The Realtor's Guide to Residential Energy Efficiency.” Prepared for the U.S. Department of Energy and the National Association of Realtors, 1980.

*Advisor to:*

United States General Accounting Office Report to the Subcommittee on Antitrust, Business Rights and Competition, Committee on the Judiciary, U.S. Senate, *Characteristics and Competitiveness of the Internet Backbone Market*, GAO-02-16, October 2001.

**New Jersey Wire Centers Verizon NJ Contends Are  
Subject to the Four-Line Carve-Out Rule**

**Newark UNE Density Zone 1**

Wire Center	CCLI code
Bergen	JRCYNJBR
Elizabeth	ELZBNJEL
Journal Square	JRCYNJJO
Leonia	FTLENJLE
Rutherford	RTFRNJRU
Union City	UNCYNJ02

**Newark UNE Density Zone 2**

Wire Center	CCLI code
Metuchen	MTCHNJMT
Morristown	MRTWNJMR
Ramsey	RMSYNJRM
Ridgewood	RGWDNJRW

**Camden UNE Density Zone 1**

Wire Center	CCLI code
Camden	CMDNNJCE

**Camden UNE Density Zone 2**

Wire Center	CCLI code
Haddonfield	HDFDNJHD
Laurel Springs	LRSPNJLS
Moorestown	MSTWNJMO

\* Verizon NJ has identified 24 wire centers in New Jersey that it contends are subject to the four-line carve-out. In addition to the 23 within its proposed "relief area" is Somerville (SOVLNJSM).

Sources: "Four or More Lines Carve Out Central Office List for Verizon East" <http://www22.verizon.com/wholesale/local/order/services/?subID=platform-platform#before>. NJ BPU Docket No. TO03090705. Verizon response to RPA-92.

**Price Discrimination Differentiates  
Submarkets within the  
Camden and Newark MSAs**

**UNE Loop Costs Vary by Wire Center**

Density Zone	1	2	3
Wholesale Cost	\$8.12	\$9.59	\$10.92

**Local Exchange Rates Vary by Wire Center**

**Business**

Rate Group	B	C	D
Flat Rate	NA	NA	NA
Message Rate	\$11.76	\$12.77	\$12.96

**Residential**

Rate Group	B	C	D
Flat Rate	\$7.45	\$7.95	\$8.19
Message Rate	\$5.99	\$6.39	\$6.58

Sources: *Wholesale Loop Costs*: Summary Order of Approval, New Jersey Board of Public Utilities Docket No. TO00060356, December 17, 2001, Attachment A.  
*Verizon Rate Group B*: Bell Atlantic - New Jersey Inc., Tariff BPU-NJ No. 2, Exchange and Network Services, Sixth Revised, page 31. *Verizon Rate Group C*: Bell Atlantic - New Jersey Inc., Tariff BPU-NJ No. 2, Exchange and Network Services, Seventh Revised, pages 33.  
*Verizon Rate Group D*: Bell Atlantic - New Jersey Inc., Tariff BPU-NJ No. 2, Exchange and Network Services, Eighth Revised, page 34. NJ BPU Docket No. TO03090705.

Note: "NA" signifies that the service is not offered.

**Attachment SMB-4**

**Verizon NJ's Proposed Geographic Markets**

**Reproduction of Attachment 3 to West/Peduto Direct Testimony (Verizon NJ)**





**Attachment SMB-5**

**Verizon NJ's Response to RPA-TRO-101**

VERIZON NEW JERSEY INC.  
BPU DOCKET NO. TO03090705  
RPA REQUEST #RPA-TRO-101  
WITNESS: VERIZON NEW JERSEY INC.  
PAGE 1 OF 1

**REQUEST:** Please provide another version of this map that, for the areas that are presently colored as dark and light orange, displays the Verizon wire center boundaries with color coding corresponding to the following categories (a) zero self-provisioning CLECs; (b) one self-provisioning CLEC; (c) two self-provisioning CLECs; (d) three or more self-provisioning CLECs. Provide the workpapers.

**RESPONSE:** Verizon objects to this request as overly broad and unduly burdensome to the extent that it purports to have Verizon create maps for RPA. Verizon has provided RPA with the wire center level breakdown for the Line Count Study.



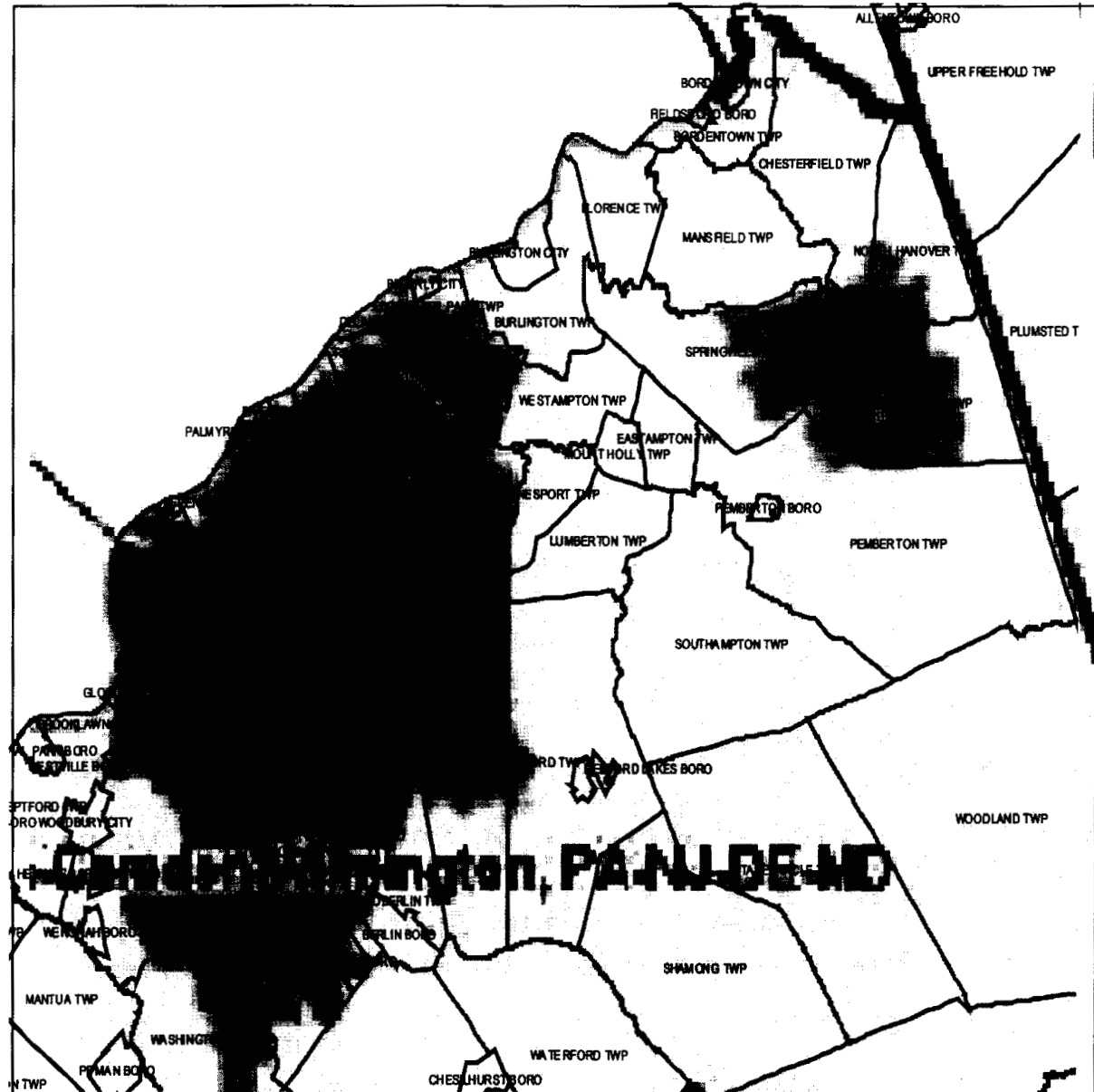
**Attachment SMB-6  
Anomalies in Verizon NJ's  
Proposed "Relief" Area  
Newark MSA**

*sources: West/Peduto Direct,  
Attachment 3; NJ DEP GIS*

**Attachment SMB-7**  
**Anomalies in Verizon**  
**NJ's Proposed "Relief"**  
**Area**

**Camden MSA**

*sources: West/Peduto Direct,*  
*Attachment 3; NJ DEP GIS*



**Attachment SMB-8**

**Excerpt of the Ratepayer Advocate Data Requests**

**NJ BPU Docket No. T003090705**

**New Jersey Board of Public Utilities  
Division of Telecommunications  
Docket No. TO03090705  
Implementation of the FCC's  
Triennial Review Order**

**Division of Ratepayer Advocate's First Set of Data and Information Requests**

**SELECTED DATA AND INFORMATION REQUESTS**

**General instructions:**

Please indicate the name, e-mail address and phone number of the person in your company responsible for responding to these questions. If your company has no relevant facilities, please send a letter indicating such, unless such a letter has already been provided in response to Staff data requests. Cable television companies that provide no qualifying telecommunications services in New Jersey should indicate such in a letter, unless such a letter has already been provided to Staff data requests. Independent local exchange carriers should respond to these information requests if they provide relevant service in Verizon's service territory.

A packet switch that could be used to provide voice services (e.g., voice over IP) should be included. Those facilities that are strictly associated with wireless messaging services should be excluded.

**SWITCHING QUESTIONS**

These questions supplement switching questions 1 through 20 issued by Staff. The responses to RPA questions 1-6, 8, and 11 should be provided in a separate electronic spreadsheet, with the switches listed in the same order as they are listed in response to Staff's questions 1 through 20. Please note that there are two worksheets in the attached electronic file. The first worksheet is for questions 1 through 6 and 8. The second worksheet is for question 11. As needed, please supplement the responses provided in the spreadsheet with any additional information relevant to the information requests that may not conform to the parameters of the spreadsheet.

These questions concern each New Jersey State switching entity that your company has self-provisioned to provide service either to your company's New Jersey retail customers and/or to other carrier(s) to provide service to their New Jersey retail customers.

Please include as the first column the 11-digit COMMON LANGUAGE® Location Identifier (CLLI™) of each switch used to provide qualifying service anywhere in the State of New Jersey. Please provide the information electronically and in printed format. The questions request information to be provided on switch-specific basis (and, in some instances, on a Verizon wire center basis). Please also provide statewide totals for each of the questions, where applicable.

RPA-1. For each switch identified, provide a list of all the Verizon wire centers in New Jersey in which your company is currently using that switch to provide local service to one or more customers.

RPA-2. Identify the total number of voice-grade equivalent lines your company is providing to customers in each of the wire centers identified in your response to the previous question. If information is not available separately by Verizon wire center, provide the information by CLLI code.

RPA-3. With respect to the voice-grade equivalent lines identified in the previous response, separately indicate the number of lines being provided to:

- a) Residential locations (in this response, also indicate the number of locations)
- b) Business locations, one line
- c) Business locations, two lines
- d) Business locations, three lines
- e) Business locations, four lines
- f) Business locations, five up to and including 18 lines (in this response, also indicate the number of locations)
- g) Business locations, 19 or more lines (in this response, also indicate the number of locations)

RPA-4. For each switch identified, indicate the quantities of lines provided to other carriers to provide service to their retail customers.

RPA-5. For each switch identified, indicate the number of carriers that use your switch to provide service to their retail customers.

RPA-12. Please indicate the first date that your company provided service to a retail customer in New Jersey using a self-provisioned switch.

RPA-13. Please indicate the first date that your company provided service to another carrier in New Jersey using your company's self-provisioned switch.

RPA-14. Where not otherwise specified, please indicate the date that corresponds with the information provided in response to the questions above (for example, data on numbers of lines served might be current as of October 30, 2003).

RPA-16. Please provide updates to the information provided in response to the previous questions and to Staff's questions 1 through 20. Specifically, provide revisions based on the most recent information available to your company as follows, and indicate, in the revised responses, the date that corresponds with the information provided:

- a) Information available to your company as of January 15, 2004;
- b) Further updates as required under the OAL rules.



### Verizon NJ's Proposed TRO Relief Area

Newark MSA		
Location Name	Wire Center	Density Zone
Bayonne	BYNNNJ02	1
Belleville	BLVLNJBE	1
Cliffside	CFPKNJCS	1
Clifton	CFTNNJCF	1
Elizabeth	ELZBNJEL	1
Englewood	ENWDNJEN	1
Hackensack	HCKNNJHK	1
Haledon	HLDNNJ01	1
Journal Square	JRCYNJJO	1
Leonia	FTLENJLE	1
Market	NWRKNJ02	1
Montclair	MTCLNJMC	1
Passaic	PSSCNJPS	1
Paterson	PTSNNJAR	1
Rutherford	RTFRNJRU	1
South Orange	SORGNJSO	1
Waverly	NWRKNJWA	1
Westwood	HLDL NJWE	1
Browntown	BWTWNJBT	2
Caldwell	CLWLNJCW	2
Dunellen	DNLNNJDU	2
East Dover	EDVRNJ01	2

Location Name	Wire Center	Density Zone
Fords	FRDSNJFR	2
Herbertsville	HBVLNJ01	2
Keyport	KYPTNJKY	2
Little Falls	LTFLNJLF	2
Madison	MDSNNJMA	2
Metuchen	MTCHNJMT	2
Morristown	MRTWNJMR	2
Mountain View	MTVWNJMV	2
New Brunswick	NBWKNJNB	2
Oradell	RVEDNJOR	2
Plainfield	PLFDNJPF	2
Point Pleasant	PTPLNJPP	2
Ramsey	RMSYNJRM	2
Red Bank	RDBKNJRB	2
South River	SORVNJSR	2
Spring Lake	SPLKNJSL	2
West Orange	WORNJWO	2
West Osbornville	WOVLNJWO	2
Woodbridge	WDBRNJWD	2

Camden MSA		
Location Name	Wire Center	Density Zone
Collingswood	CLWDNJCW	1
Camden	CMDNNJCE	1
Cherry Hill	CRHLNJCH	2
Gloucester	GLCYNJGL	2
Marlton	MARLNJMA	2
Merchantville	MHVLNJME	2
Riverside	RVSDNJRS	2
Willingboro	WLBONJWB	2
Sources: Verizon response to RPA 2-92. NJ BPU Docket No. TO03090705.		

**Retail and Wholesale Lines in Newark and Camden MSAs, Sorted by Counties**

Newark MSA			UNE Density Zone	Retail Access Lines	Wholesale Switched Access Lines	Retail - Residence Lines	Retail - Business Lines	TRO Mass Market Relief Area
Location	CLLI	County						

**REDACTED – FOR PUBLIC INSPECTION**

Location	CLLI	County	UNE		Wholesale		Retail -		Retail -		TRO Mass	
			Density	Zone	Access	Lines	Access	Lines	Residence	Business	Market	Relief

REDACTED – FOR PUBLIC INSPECTION



Location	CLLI	County	UNE Density Zone	Retail Access Lines	Wholesale Switched Access Lines	Retail - Residence Lines	Retail - Business Lines	TRO Mass Market Relief Area

REDACTED – FOR PUBLIC INSPECTION





<u>Location</u>	<u>CLLI</u>	<u>County</u>	<u>UNE Density Zone</u>	<u>Retail Access Lines</u>	<u>Wholesale Switched Access Lines</u>	<u>Retail - Residence Lines</u>	<u>Retail - Business Lines</u>	<u>TRO Mass Market Relief Area</u>
[REDACTED]								
Sources: Verizon response to RPA 2-93. NJ BPU Docket No. TO03090705.								